

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

U.S. DISTRICT COURT
DISTRICT OF MAINE
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UNITED STATES OF AMERICA

v.

JESUS WELLINGTON KONG

Magistrate Case No. 1:18-mj-00385-JCN
(18 U.S.C. § 875(c) – Interstate Threats)

CRIMINAL COMPLAINT

The undersigned complainant, being duly sworn, states:

**COUNT ONE
(Interstate Threats)**

On about November 24, 2018, in the District of Maine and elsewhere, defendant

JESUS WELLINGTON KONG

knowingly and willfully did transmit in interstate commerce a communication containing a threat to injure the person of another. Specifically, the defendant, via the internet, made a posting to the Facebook page of a company physically located in the State of Maine that stated the following: “i really want to commit a mass shooting at your central office i will not lie.” Later that same day, on his own Facebook page, the defendant wrote: “its better to attack the central office its less secure then the northern office ... sincerely from your favorite war strategist ...”

The defendant thus violated Title 18, United States Code, Section 875(c).

**COUNT TWO
(Interstate Threats)**

On about December 3, 2018, in the District of Maine and elsewhere, defendant

JESUS WELLINGTON KONG

knowingly and willfully did transmit in interstate commerce a communication containing a threat to injure the person of another. Specifically, the defendant, via the internet, made a posting to

his Facebook page that stated the following: “,,because,,,i am the man that keeps threatening to shoot up skowhegan area high school and leave a few students in a bloody pool,,,”


The defendant thus violated Title 18, United States Code, Section 875(c).

The complainant states that this complaint is based on the attached affidavit, which is incorporated by reference herein.



Tyler Martin
Special Agent
United States Secret Service

SWORN AND SUBSCRIBED TO before me
This 5th day of December 2018



JOHN C. NIVISON
UNITED STATES MAGISTRATE JUDGE

A TRUE COPY
ATTEST: Christa K. Berry, Clerk

By: 

Deputy Clerk